

NATALIE K. WIGHT, OSB #035576

United States Attorney

District of Oregon

**GAVIN W. BRUCE, OSB #113384**

Assistant United States Attorney

[Gavin.Bruce@usdoj.gov](mailto:Gavin.Bruce@usdoj.gov)

405 East 8th Avenue, Suite 2400

Eugene, Oregon 97401

Telephone: (541) 465-6771

**CAMERON A. BELL, CSB #305872**

Trial Attorney—Civil Rights Division

950 Pennsylvania Avenue, NW

Washington, DC 20530

[Cameron.Bell@usdoj.gov](mailto:Cameron.Bell@usdoj.gov)

Telephone: (202) 802-7643

Attorneys for the United States of America

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORLTAND DIVISION**

**UNITED STATES OF AMERICA**

**Case No. 3:22-cr-00084-SI**

**v.**

**GOVERNMENT'S PROPOSED  
VERDICT FORM**

**TONY DANIEL KLEIN,**

**Defendant.**

The United States submits the following Proposed Verdict Form.

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Dated: April 21, 2023

NATALIE K. WIGHT  
United States Attorney

/s/ Gavin W. Bruce  
GAVIN W. BRUCE  
Assistant United States Attorney

Respectfully submitted,  
KRISTEN CLARKE  
ASSISTANT ATTORNEY GENERAL

/s/ Cameron A. Bell  
CAMERON A. BELL  
Trial Attorney  
Civil Rights Division

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 3:22-cr-00084-SI

v.

VERDICT FORM

TONY DANIEL KLEIN,

**Defendant.**

We the jury, duly empaneled and sworn to try the case of *United States v. Tony Daniel Klein*, hereby find as follows:

Count 1: Deprivation of rights (Between on or about September 1, 2017 and on or about September 30, 2017, defendant penetrated AV1's vulva with his penis without her consent):

GUILTY

NOT GUILTY

If guilty, please answer the following questions:

(1) Did the offense include aggravated sexual abuse?

Yes

No

(2) Did the offense result in bodily injury?

Yes

No

Count 2: Deprivation of rights (On or about August 15, 2017, defendant touched AV2's breast without her consent and exposed his penis to AV2 without her consent):

GUILTY

NOT GUILTY

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Count 3: Deprivation of rights (On or about September 17, 2017, defendant digitally penetrated AV2's genital opening without her consent):

GUILTY

NOT GUILTY

Count 4: Deprivation of rights (On or about September 17, 2017, defendant penetrated AV2's vulva with his penis without her consent):

GUILTY

NOT GUILTY

If guilty, please answer the following questions:

(1) Did the offense include aggravated sexual abuse?

Yes

No

(2) Did the offense result in bodily injury?

Yes

No

Count 5: Deprivation of rights (On or about March 26, 2017, defendant caused his penis to have contact with AV3's mouth without her consent and masturbated in front of AV3 without her consent):

GUILTY

NOT GUILTY

Count 6: Deprivation of rights (Between on or about August 1, 2017, and on or about August 31, 2017):

GUILTY

NOT GUILTY

If guilty, please answer the following question:

(1) Did the offense include aggravated sexual abuse?

Yes

No

Count 7: Deprivation of rights (On or about September 29, 2017, defendant penetrated AV3's vulva with his penis without her consent):

GUILTY

NOT GUILTY

Count 8: Deprivation of rights (Between on or about October 1, 2017, and on or about October 31, 2017, defendant caused his penis to have contact with AV3's mouth without her consent):

GUILTY

NOT GUILTY

If guilty, please answer the following question:

(1) Did the offense include aggravated sexual abuse?

Yes

No

Count 9: Deprivation of rights (On or about November 13, 2017, defendant touched AV3's breasts without her consent):

GUILTY

NOT GUILTY

Count 10: Deprivation of rights (Between on or about May 1, 2017, and on or about November 30, 2017, defendant penetrated AV4's vulva without her consent):

GUILTY

NOT GUILTY

If guilty, please answer the following question:

(1) Did the offense result in bodily injury?

Yes

No

Count 11: Deprivation of rights (On or about December 12, 2016, defendant touched AV5's buttocks without her consent):

GUILTY

NOT GUILTY

Count 12: Deprivation of rights (Between on or about December 23, 2016, and on or about July 24, 2017, defendant touched AV6's genitalia without her consent and touched her inner thigh without her consent):

Count 13: Deprivation of rights (Between on or about December 23, 2016, and on or about July 24, 2017, defendant caused AV6 to touch his penis without her consent):

Count 14: Deprivation of rights (Between on or about December 23, 2016, and on or about July 24, 2017, defendant touched AV6's breasts without her consent):

**GUILTY**      **NOT GUILTY**

Count 15: Deprivation of rights (Between on or about March 1, 2017 and on or about September 30, 2017, defendant digitally penetrated AV7's genital opening without her consent):

Count 16: Deprivation of rights (Between on or about July 3, 2017, and on or about July 17, 2017, defendant digitally penetrated AV8's genital opening without her consent):

Count 17: Deprivation of rights (Between on or about July 15, 2017, and on or about August 31, 2017, defendant touched AV9's genitalia without her consent):

**GUILTY**      **NOT GUILTY**

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Count 18: Deprivation of rights (Between on or about August 2, 2017, and on or about August 13, 2017, defendant touched AV10's breasts without her consent and caused his penis to touch AV10's body without her consent):

GUILTY

NOT GUILTY

Count 19: Deprivation of rights (Between on or about July 3, 2017, and on or about September 21, 2017, defendant touched AV11's genitalia without her consent):

GUILTY

NOT GUILTY

Count 20: Deprivation of rights (Between on or about October 21, 2017, and on or about October 25, 2017, defendant touched AV12's breasts without her consent):

GUILTY

NOT GUILTY

Count 21: Deprivation of rights (Between on or about October 21, 2017, and on or about October 25, 2017, defendant touched AV12's genitalia without her consent):

GUILTY

NOT GUILTY

Count 22: False Declaration Before Court (denied that he had sexual vaginal intercourse with an incarcerated adult):

GUILTY

NOT GUILTY

Count 23: False Declaration Before Court (denied that he had penetrated the vagina or anus of any adult incarcerated female using his penis, fingers, or tongue):

GUILTY

NOT GUILTY

Count 24: False Declaration Before Court (denied that he had kissed any adult incarcerated female):

GUILTY

NOT GUILTY

Count 25: False Declaration Before Court (denied that he had any sexual contact with any adult female incarcerated person with the intent to abuse, arouse, or gratify his sexual desire):

GUILTY

NOT GUILTY

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Presiding Juror